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The Timken Corporation

Hearing Date: 02/17/11 at 10:00 a.m. (ET) Response Deadline: 02/3/11 at 4:00 p.m. (ET)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re :

Chapter 11

DPH HOLDINGS CORP, et al.,

Reorganized Debtors.

Case No. 05-44481 (RDD)

(Jointly Administered)

DELPHI AUTOMOTIVE SYSTEMS, LLC,

: Adv. Pro. No. 07-02688 (RDD)

Plaintiff,

-against-

THE TIMKEN COMPANY and THE TIMKEN CORPORATION,

Defendants.

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NOTICE OF MOTION AND BRIEF OF DEFENDANT FOR RELIEF FROM FOURTH ORDER EXTENDING TIME TO SERVE COMPLAINT

PLEASE TAKE NOTICE THAT:

On October 22, 2010, The Timken Company and The Timken Corporation (the "Defendants"), through their attorneys, Arent Fox LLP, filed their *Motion and Brief for Relief from Fourth Order Extending Time to Serve Complaint* (the "Motion"). A hearing with respect to the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, of the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas

Street, White Plains, New York, 10601, on **February 17, 2011 at 10:00 a.m.** (**Eastern Time**), or as soon thereafter as counsel may be heard.

A copy of the Motion may be obtained by (a) contacting the attorneys for the Defendants, Arent Fox LLP, 1675 Broadway, New York, New York 10019 (Attn: James Sullivan, Esq.), Telephone: (212) 484-3945; (b) accessing the Court's website at www.nysb.uscourts.gov (please note that a PACER password is needed to access documents on the Court's website); (c) viewing the docket of these cases at the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004; or (d) accessing the public website maintained by the Debtors' court-appointed claims and noticing gent in these cases at www.kccllc.net.

The deadline to file objections and responses to the Motion is **February 3, 2011** at **4:00** p.m. (Eastern Time) (the "Objection Deadline").

Objections and responses, if any, to the Motion must be in writing and must (a) conform to the Federal Rules of Bankruptcy Procedure, the Local Rules of the Bankruptcy Court for the Southern District of New York, and any case management orders in these chapter 11 cases, (b) set forth the name of the objecting party, the nature and amount of claims or interests held or asserted by the objecting party against the Debtors' estates or property, and (c) set forth the basis for the objection and the specific grounds therefore.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be filed with the Bankruptcy Court (a) by registered users of the Bankruptcy Court's filing system, electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing

format (with hard copy delivered directly to Chambers), in accordance with General Order M-182

(which can be found at www.nysb.uscourts.gov), and shall be served in accordance with General

Order M-242, and on (i) Arent Fox LLP, 1675 Broadway, New York, New York 10019 (Attn:

James Sullivan, Esq.); (ii) the Debtors, DPH Holdings Corp. (f/k/a Delphi Corporation, et al.),

Attn: John Brooks, 5725 Delphi Drive, Troy, Michigan 48098; (iii) Butzel Long, Attn: Cynthia J.

Haffey, 150 W. Jefferson Avenue, Suite 100, Detroit, Michigan 48226; (iv) Butzel Long, Attn:

Eric Fisher, 380 Madison Avenue, 22nd Floor, New York, New York 10017; (v) Latham &

Watkins, attorneys for The Official Committee of Unsecured Creditors, Attn: Mark A. Broude

and Robert J. Rosenberg, 885 Third Avenue, New York, New York 10022 and Warner Stevens,

L.L.P., Attn: Michael D. Warner, 301 Commerce Street, Suite 1700, Fort Worth, Texas 75102;

(vi) the Office of the United States Trustee for the Southern District of New York, Attn: Alicia

M. Leonhard, Trace Hope Davis, and Brian Masumoto, 33 Whitehall Street, 21st Floor, New

York, New York 10004, so as to be received no later than the **Objection Deadline**.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the

hearing. Failure to appear at the Hearing may result in relief being granted or denied upon

default.

ARENT FOX LLP

By:

/s/ James Sullivan

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Counsel to The Timken Company and The Timken

Corporation

Dated: October 22, 2010

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